

**AMERICAN ARBITRATION ASSOCIATION
New York City, New York**

Zhou Lijun,)	
Claimant,)	
)	
v.)	No. 01-24-0005-7149
)	
Brooklyn Public Library 100 GP LLC, and)	
Brooklyn Public Library Funding 100 LLC,)	
Respondents.)	
)	

SUBPOENA TO PRODUCE DOCUMENTS AND INFORMATION

**TO: One Clinton LLC
c/o The Hudson Companies Inc.
826 Broadway, 11th Floor
New York, NY 10003
(212) 777-9500**

You are commanded to produce the following materials and information by September 30, 2024, through email attachment to the undersigned attorney. The term “You” shall include One Clinton LLC, The Hudson Companies Incorporated, and any affiliates, whether entities or individuals:

Reference is made to section 3.9 of the Amended and Restated Mezzanine Loan and Security Agreement dated July 20, 2021, among One Clinton LLC as “Borrower” and BPL Funding 100 LLC as “Lender” (the “Mezz Loan Agreement”):

III. CONDITIONS TO CLOSING

The obligation of Lender to close the Loan pursuant to the Loan Documents is subject to the fulfillment by, or on behalf of, Borrower or waiver by Lender in its sole and absolute discretion of the following conditions precedent on the Closing Date, it being agreed that the execution and delivery of the Loan Documents by Lender to Borrower shall be conclusive evidence that all conditions set forth in this Article III have been satisfied or waived unless

provided to the contrary in a post-closing obligations letter executed and delivered by Borrower to Lender: . . .

3.9. Equity Requirement. Borrower shall have demonstrated to Lender's satisfaction that Borrower has contributed equity or incurred costs in connection with and allocable entirely to the Property and/or the construction of the Project in an amount not less than the Required Equity Investment. . . .

"Required Equity Investment" means, equity invested in the Project in the amount of Eighty-One Million Three Hundred Fifty Thousand and 00/100 Dollars (\$81,350,000.00), in the form of cash and/or the purchase price of the Land.

Production Request #1: Provide documents showing that You made the *full* Required Equity Investment of \$81,350,000, or, if You provided *partial* funding, provide documents showing the lesser amount.

Production Request #2: Provide copies of all communications (including writings, text, email, or summaries of verbal conversations) relating to the Required Equity Investment.

Interrogatory Request #1: Describe all inquiries by the Lender as to whether You made the Required Equity Investment.

Date: September 9, 2024

/s/ Zhiping Liu
Liu, Chen, & Hoffman LLP
14 Penn Plaza, Suite 2020
New York, New York 10122
917-698-3258
zliu@ambizlaw.com
Counsel for Claimant

Dated: September 9, 2024



William D. Johnston, Arbitrator